

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SHAW FAMILY ARCHIVES, LTD., EDITH MARCUS,
META STEVENS, BRADFORD LICENSING, INC.,
JAMES E. DOUGHERTY, and VALHALLA
PRODUCTIONS, LLC,

05 CV 3939 (CM)

Plaintiffs/Consolidated Defendants,

-against-

**PLAINTIFFS/CONSOLIDATED
DEFENDANTS RULE 26(a)(1)
INITIAL DISCLOSURES**

CMG WORLDWIDE, INC., an Indiana Corporation,
and MARILYN MONROE, LLC, a Delaware Limited
Liability Company,

Defendants/Consolidated Plaintiffs.
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Plaintiffs/Consolidated Defendants BRADFORD LICENSING ASSOCIATES
("Bradford") and SHAW FAMILY ARCHIVES, LTD., ("SFA"), by and through its undersigned
counsel and pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, hereby submit
these initial disclosures. Bradford and SFA reserve the right to amend and supplement these
initial disclosures to include information obtained through the course of further investigation,
and Bradford and SFA are not waiving any claim to privilege or immunity, including, but not
limited to, work product protection.

A. WITNESSES

Based on the information of which Bradford and SFA are now aware, the following
individuals are likely to have discoverable information that Bradford and SFA may use to
support their claims or defenses:

- Larry Shaw, Shaw Family Archives, Ltd., 225 Hudson Terrace, Piermont, New York
10968.

- Edith Marcus, Shaw Family Archives, Ltd., 225 Hudson Terrace, Piermont, New York 10968.
- Meta Stevens, Shaw Family Archives, Ltd., 225 Hudson Terrace, Piermont, New York 10968.
- Len Reiter, President, Bradford Licensing Associates, 209 Cooper Avenue, Upper Montclair, New Jersey 07043.
- Michelle Minieri, Senior Vice President, Bradford Licensing Associates, 209 Cooper Avenue, Upper Montclair, New Jersey 07043.

B. DOCUMENTS

Bradford and SFA will produce non-privileged documents and any other material in their possession, custody or control, after such documents and materials have been assembled, that it may use to support its claims or defenses, including, but not limited to:

- Documents and any other materials relating to the alleged right of publicity for the name, image and persona of Marilyn Monroe;
- Documents relating to SFA's ownership of photographs within their archives, including photographs of Marilyn Monroe taken by Sam Shaw;
- Documents relating to SFA's ownership of the copyrights of the photographs within their archives, including photographs of Marilyn Monroe taken by Sam Shaw;
- Documents relating to Bradford and SFA's right to license the photographs within SFA's archives, including photographs of Marilyn Monroe taken by Sam Shaw;
- Documents relating to Marilyn Monroe's residence and domicile at the time of her death;

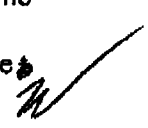
- Documents relating to defendants/consolidated plaintiffs' infringement of SFA's copyrights;
- Documents relating to defendants/consolidated plaintiffs' interference with SFA's contractual relations;
- Documents relating to defendants/consolidated plaintiffs' interference with SFA's prospective economic advantage; and
- Documents related to damages to SFA and Bradford.

In addition, SFA and Bradford incorporate by reference all documents and any materials disclosed by defendants/consolidated plaintiffs in their initial disclosures as supplemented and/or referenced in the pleadings. SFA and Bradford expect that they will support their claims or defenses with documents and any other materials disclosed by defendants/consolidated plaintiffs in their initial disclosures, as well as with documents and any other material produced in response to document requests that SFA and Bradford will propound in this action. SFA and Bradford also expect that they will support their claims or defenses with documents produced by non-party individuals or entities in response to document subpoenas that SFA and Bradford will propound in this action.

C. DAMAGES

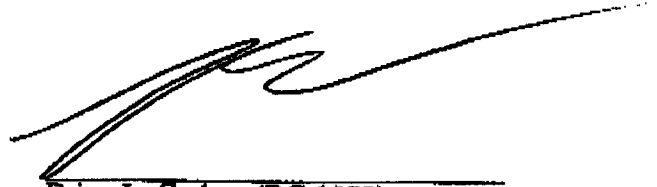
SFA and Bradford's damages are not yet ascertainable and continue to accrue and accumulate. SFA and Bradford will provide this information as it becomes available.

D. INSURANCE

SFA is not aware of any applicable insurance. Bradford is currently trying to determine the extent to which they may have insurance that is applicable to the instant matter, ^{and} will provide 

this information as it becomes available.

Dated: New York, New York
July 10, 2006



Brian L. Greben (BG 1572)
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Defendants
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and BRADFORD LICENSING
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FACSIMILE COVER SHEET

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From: Brian L. Greben, Esq.
Marcus & Greben

Re: *Shaw Family Archives, LTD, et al. v. CMG Worldwide, Inc., et al.*
Docket No. 05 CV 3939 (CM)

Please find the enclosed FRCP 26(a)(1) disclosures.

There are a total of 5 pages with this fax message, including this cover sheet. Kindly call Mr. Greben at 917.612.0486 should you have any questions.